

THE HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

CORLIS VERNON, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

CLOSETS BY DESIGN, INC. and CBD
FRANCHISING, INC.,

Defendants.

Case No. 2:23-cv-01180-JNW

**STIPULATED MOTION TO
EXTEND CLASS CERTIFICATION
BRIEFING SCHEDULE**

NOTE FOR MOTION CALENDAR:
January 22, 2025

STIPULATED MOTION

Pursuant to LCR 7(d)(1) and LCR (10)(g), Plaintiff Corlis Vernon (“Plaintiff”) and Defendants Closets by Design, Inc. and CBD Franchising, Inc. (“Defendants”), hereby submit this stipulated motion to extend the class certification briefing schedule set forth in the Court’s July 17, 2024, Minute Order (Dkt. 44). In support of this motion, the Parties state as follows:

WHEREAS, on November 15, 2023, Defendants filed their Motion to Dismiss for Lack of Personal Jurisdiction (Dkt. 27).

WHEREAS, on July 17, 2024, the Court issued a Minute Order setting forth the following deadlines regarding class certification (Dkt. 44):

Event	Date
Affirmative class certification expert disclosures	120 days after the Court’s decision on the pending motion to dismiss

1	Rebuttal class certification expert disclosures	14 days after affirmative class
2		certification expert disclosures
3	Completion of depositions of class certification	28 days after rebuttal class certification
4	experts	expert disclosures
5	Deadline to file Motion for class certification	28 days after the deadline to complete
6		depositions of class certification
7		experts
8	Deadline to file Opposition to motion for class	28 days after motion for class
9	certification	certification
10	Deadline to file Reply to motion for class	28 days after reply to motion for class
11	certification	certification

12 WHEREAS, on September 30, 2024, the Court issued its Order denying Defendant's Motion to
 13 Dismiss (Dkt. 45). Pursuant to the Court's July 17, 2024, Minute Order (Dkt. 44), the current deadlines
 14 for class certification are as follows:

15	Event	Date
16	Affirmative class certification expert disclosures	January 28, 2025
17	Rebuttal class certification expert disclosures	February 11, 2025
18	Completion of depositions of class certification	March 11, 2025
19	experts	
20	Deadline to file Motion for class certification	April 8, 2025
21	Deadline to file Opposition to motion for class	May 6, 2025
22	certification	
23	Deadline to file Reply to motion for class	June 3, 2025
24	certification	

25 WHEREAS, the Parties have conferred and agree that, due to personal and professional
 26 obligations, the Parties need additional time to fully consider and brief all relevant class certification
 27

issues. Thus, the Parties respectfully propose that the deadlines for expert disclosures, class certification briefing, and completion of depositions of class certification experts be modified as follows:

1. Affirmative class certification expert disclosures and reports shall be due no later than April 8, 2025;
2. Rebuttal class certification expert disclosures and reports shall be due no later than May 6, 2025;
3. Completion of depositions of Plaintiff's class certification experts shall be done by May 6, 2025;
4. Completion of depositions of Defendant's class certification experts shall be done June 3, 2025;
5. Plaintiff shall file a motion for class certification no later than June 10, 2025;
6. Defendants shall file an opposition to Plaintiff's class certification motion no later than July 22, 2025; and
7. Plaintiff shall file a reply to Defendant's opposition to Plaintiff's class certification motion no later than August 26, 2025.

WHEREFORE, IT IS HEREBY STIPULATED AND AGREED TO BY THE PARTIES that the schedule regarding class certification be modified as follows:

Event	Date
Affirmative class certification expert disclosures	April 8, 2025
Deadline to file Motion for class certification	June 10, 2025
Rebuttal class certification expert disclosures	May 6, 2025
Completion of depositions of Plaintiff's class certification experts	May 6, 2025
Deadline to file Opposition to motion for class certification	July 22, 2025
Completion of depositions of Defendant's class	June 3, 2025

1 certification experts

2 Deadline to file Reply to motion for class

August 26, 2025

3 certification

6 Dated: January 22, 2025

Respectfully submitted,

7 By: s/ Simon Franzini

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ORDER

As described by the above Stipulated Motion, IT IS SO ORDERED.

1. Affirmative class certification expert disclosures and reports shall be due no later than April 8, 2025;
2. Rebuttal class certification expert disclosures and reports shall be due no later than May 6, 2025;
3. Completion of depositions of Plaintiff's class certification experts shall be done by May 6, 2025;
4. Completion of depositions of Defendant's class certification experts shall be done by June 3, 2025;
5. Plaintiff shall file a motion for class certification no later than June 10, 2025;
6. Defendants shall file an opposition to Plaintiff's class certification motion no later than July 22, 2025; and
7. Plaintiff shall file a reply to Defendant's opposition to Plaintiff's class certification motion no later than August 26, 2025.

This will be the last extension granted by the Court absent extraordinary circumstances.

Dated on this 29th day of January, 2025.


Jamal N. Whitehead
United States District Judge

Certificate of Compliance

I, Simon Franzini, attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

By: /s/ Simon Franzini

Simon C. Franzini